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Interim Co-Lead Counsel for Plaintiff Class

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

**IN RE: HIGH-TECH EMPLOYEE
ANTITRUST LITIGATION**

THIS DOCUMENT RELATES TO:

ALL ACTIONS

Master Docket No. 11-CV-2509-LHK

**PLAINTIFFS' ADMINISTRATIVE
MOTION TO SEAL, PURSUANT TO
CIVIL LOCAL RULE 79-5(d), EXHIBIT
A TO THE MARCH 1, 2013 JOINT
DISCOVERY STATUS REPORT**

1 Pursuant to Local Rules 7-11 and 79-5(d), Plaintiffs move to seal Exhibit A to the March
 2, 2013 Joint Discovery Status Report.

3 None of the information at issue was designated confidential by Plaintiffs. Instead,
 4 Defendant Google designated the entire transcripts of both Shona Brown and Alan Eustace
 5 Highly Confidential, Attorneys Eyes Only under the terms of the Stipulated Protective Order
 6 (Modified by the Court), (Dkt. 107). Therefore, the requirements of Local Rule 79-5(d) apply.

7 Pursuant to Local Rule 79-5(d), the proposed redacted version of Exhibit A to the Status
 8 Report has been attached as Exhibit 1 to this motion, served and lodged with the Court. Pursuant
 9 to Local Rule 79-5(c)(4) and the Court's January 11, 2013 Order (Dkt. 269), attached hereto as
 10 Exhibit 2, and lodged with the Court, is Exhibit A to the Status Report with the proposed
 11 redactions highlighted in Yellow. Pursuant to Local Rule 79-5(c)(5), Plaintiffs have lodged and
 12 served redacted versions of Exhibit A.

13 Respectfully submitted,

14 Dated: March 1, 2013 LIEFF CABRASER HEIMANN & BERNSTEIN, LLP

15 By: /s/ Lisa J. Cisneros
 16 Lisa J. Cisneros

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